



U.S. Department of Justice

United States Attorney  
Southern District of New York

The Jacob K. Javits Building  
26 Federal Plaza, 37<sup>th</sup> Floor  
New York, New York 10278

January 22, 2025

**By ECF**

The Honorable Richard M. Berman  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

**Re: *United States v. Junard Parrot*, 21 Cr. 691 (RMB)**

Dear Judge Berman:

The Government respectfully requests an extension of time to respond to the defendant's motion for a reduction in sentence, filed on December 26, 2024. (ECF No. 33).

On December 27, 2024, the Court set a deadline of January 17, 2025, for the Government to respond to the defendant's motion. Because the Assistant United States Attorney who had previously worked on this defendant's case has left the United States Attorney's Office, the Office did not timely respond. The undersigned counsel for the Government was assigned to this matter today, January 22, 2025. Accordingly, the Government requests additional time to obtain and review records, to consider the Government's position on the motion, and to draft its response. The Government respectfully requests leave to file its response on or before February 12, 2025 (*i.e.*, three weeks from today).

The Court respectfully requests the  
Government's response by February 5, 2025.

Respectfully submitted,

DANIELLE R. SASSOON  
United States Attorney

by:

  
Rebecca Delfiner  
Assistant United States Attorney  
(212) 637-2427

SO ORDERED:

Date: 1/22/2025

  
Richard M. Berman, U.S.D.J.

cc: All counsel of record (via ECF)